

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CITY OF AKRON, OHIO**

**and**

**THE STATE OF OHIO**

**Defendants.**

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**CASE NO. 5:09-cv-00272**

**JUDGE JOHN R. ADAMS**

**MOTION TO WITHDRAW AS CO-COUNSEL**

Pursuant to Local Rule 83.9, Mark J. Navarre, Assistant Attorney General, State of Ohio, hereby moves this Court for leave to withdraw as co-counsel for plaintiff State of Ohio (“the State”) in the above-captioned matter. Mr. Navarre will retire from the Ohio Attorney General’s Office on April 5, 2025 and therefore will not be able to continue to represent the State in this matter. In compliance with Local Rule 83.9, Mr. Navarre confirms that notice of this motion for leave to withdraw as co-counsel has been provided to the Ohio EPA and will be available to counsel for all other parties electronically via this pleading. The Ohio Attorney General’s Office and Amber Wootton Hertlein, Assistant Attorney General, will continue as co-counsel on behalf of the State in this matter.

Respectfully submitted,

**DAVE YOST**  
**OHIO ATTORNEY GENERAL**

/s/ Mark J. Navarre

Mark J. Navarre (0013674)  
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*Counsel for the State of Ohio*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing motion has been served upon all counsel of record by the Court's CM/ECF Electronic Filing System this 11<sup>th</sup> day of March, 2025.

/s/ Mark J. Navarre

Mark J. Navarre (0013674)  
Assistant Attorney General